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9
10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN JOSE DIVISION

13 IN RE: HIGH-TECH EMPLOYEE
14 ANTITRUST LITIGATION

15 THIS DOCUMENT RELATES TO:
16 ALL ACTIONS

Case No. 3:11-cv-2509-LHK

**PLAINTIFFS' AND LUCASFILM'S
CORRECTIONS TO JOINT CASE
MANAGEMENT STATEMENT**

Date: March 13, 2013
Time: 2:00 p.m.
Courtroom: 8, 4th Floor
Judge: Hon. Lucy H. Koh

Date Consol. Amended Compl. Filed:
September 13, 2011

Trial Date: November 12, 2013

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2 Counsel for both Plaintiffs and Lucasfilm Ltd. ("Lucasfilm") jointly submit this
3 addendum to correct two errors in the Case Management Conference Statement ("CMC
4 Statement") dated March 6, 2013 [Dkt. 340] that appear to have resulted from misunderstandings
5 on each side.

6 First, Plaintiffs wish to correct their statement that, on March 4, 2013, Lucasfilm produced
7 "an additional 72,213 pages of documents," that "increased the volume of [Lucasfilm's]
8 production to date by nearly 50%," CMC Statement at 4 n.3., a statement Plaintiffs made based
9 on the Bates range indicated in Lucasfilm's cover letter which Plaintiffs also confirmed in
10 discussions with Lucasfilm's counsel. However, Lucasfilm's March 4 production actually only
11 consisted of 971 documents and 6,947 pages, equivalent to 1.3% of the documents and 3.2% of
12 the pages Lucasfilm had previously produced.

13 Second, Lucasfilm wishes to correct its statement that Plaintiffs did not ask to depose
14 Steve Condiotti until January 2013. CMC Statement at 6. In fact, certain counsel for Plaintiffs
15 first requested Mr. Condiotti's deposition by letter to certain counsel for Lucasfilm on November
16 30, 2012. During January and February 2013, Plaintiffs and Lucasfilm conferred and agreed that
17 Mr. Condiotti would be treated as a document custodian and also agreed on the schedule for
18 production of Mr. Condiotti's documents.

19 Although counsel for Plaintiffs and counsel for Lucasfilm reviewed drafts and met and
20 conferred in good faith, neither party identified the errors prior to the CMC Statement's filing.
21 The parties regret any inconvenience to the Court.

22
23 Dated: March 8, 2013

KEKER & VAN NEST LLP

24 By: /s/ Justina K. Sessions
25 JUSTINA K. SESSIONS
26 Attorneys for Defendant
27 LUCASFILM LTD.
28

1 Dated: March 8, 2013

JOSEPH SAVERI LAW FIRM

2
3 By: /s/ Joseph R. Saveri
Joseph R. Saveri

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12 Dated: March 8, 2013

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25 **ATTESTATION:** Pursuant to General Order 45, Part X-B, the filer attests that concurrence in
26 the filing of this document has been obtained from all signatories.
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